REMARKS

Claim 37 has been amended. Applicants reserve the right to pursue the original claims and other claims in this application and other applications. Claims 1-10 and 31-37 are pending in this application.

Claims 1 and 31 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Specifically, the Office Action contends that Applicant has not clearly defined proxy. Reconsideration is respectfully requested.

As described in Fig. 2 and corresponding disclosure in the Specification, the gateway server monitors the local network to determine if a new device is found. If a new device is found, the gateway server attempts to identify and authenticate the device. Upon identification and authentication, the gateway server creates and registers a proxy for the device in a directory stored in the gateway server. A remote device coupled to the network can then select and invoke a service of the device in the local network, via the registered proxy in the gateway server. The proxy, therefore, acts as an intermediary between the wireless communications from the actual device and the network to which the gateway server is connected, thereby creating a communication channel that allows the actual device to send data to and receive data from the network. This is completely consistent with each of the definitions provided in the Office Action, i.e., "acts as an intermediary between computers on your LAN and computers on the Internet," "acts as a middleman for network communication, filtering the data being sent," and "accepts requests from a client, such as a Web browser or FTP client, and forwards the request to the appropriate Internet server." Note also that the memo "SIP:Session Initiation Protocol – Locating SIP Servers" simply indicates that an outbound proxy can be configured by any mechanism, including DHCP. This means that an outbound proxy (as defined in that article) can be given an IP address using DHCP. This in no way changes the use or function of the outbound proxy as defined in the other references cited in the Office Action, but instead simply indicates how an IP Address can be assigned to the proxy. Applicant is not attempting to assign any special meaning to the term "proxy," and respectfully submits that claims 1 and 31 apprises one of ordinary skill in the art of its scope. The term proxy, as noted by the consistent definition provided by several references

cited in the Office Action, has a well recognized meaning and therefore is not indefinite. Applicants respectfully submit that all claims are in full compliance with 35 U.S.C. § 112.

Claim 37 stands rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Specifically, the Office Action contends that Applicant has not disclosed status report. Reconsideration is respectfully requested. Claim 37 has been amended to clarify that a service that can be selected using the remote device is generation of an operating status report for sending to the remote device. The support for this amendment can be found on page 6, lines 24-26. Thus, a remote device could access a device in the local network to determine the operating status of the device, e.g., whether the device is operational or not. Applicants respectfully submit that claim 37 apprises one of ordinary skill in the art of its scope and therefore is not indefinite. Applicant respectfully submits that all claims are in full compliance with 35 U.S.C. § 112.

Claims 1-10 and 31-37 stand rejected under 35 U.S.C. 103(a) as being unpatentable over LeCarpentier (U.S. 4,752,950) in view of Lee (U.S. 5,657,689) and further in view of the article "Wireless Networking Review" by Ken Sinclair (hereinafter referred to as Sinclair). Reconsideration is respectfully requested.

Claim 1 is directed to a mailing system that comprises "a plurality of devices associated with mail preparation, each of said plurality of devices adapted to communicate with other of said plurality of devices via a wireless communication; a gateway server adapted to communicate with each of said plurality of devices via a wireless communication, said gateway server being coupled to a communication network, said gateway server and said plurality of devices forming a local network, said gateway server acting as a master of said local network, each of said plurality of devices communicating with another of said plurality of devices via a wireless communication through said gateway server; and a remote device coupled to said communication network, said remote device communicating with said gateway server via said communication network, said gateway server creating a proxy for each of said plurality of devices in said local network, wherein a service of at least one of said plurality of devices can be invoked by said remote device utilizing said created proxy for said at least one of said plurality of devices."

LeCarpentier is directed to a remote control system for a set of franking machines which are geographically dispersed. Each franking head is connected to a local concentrator station via a data transmission link, and each local station is itself connected via a telephone channel to a central remote meter-reading station of the central organization, which local stations both monitor the franking machines and collect operating data read from the franking heads by means of bases, and also communicate the operating data to the central station after grouping the data and calling the central station via a telephone channel. (Col. 1, line 55 to Col. 2, line 1). In LeCarpentier, the central station serves as a concentrator for an entire set of franking machines to store and process all of the management data relating to operation of the franking machines in order to bill the franking performed and without processing the franking per se. (Col. 2, lines 45-53).

The Office Acton contends that Fig. 1 and the disclosure associated with Fig. 1 of LeCarpentier teach "a plurality of devices associated with mail preparation, each of said plurality of devices adapted to communicate with other of said plurality of devices via a wireless communication" as is recited in claim 1. Applicants respectfully disagree. The franking machines 1A, 1B, 1C, 1D, 1E, 1F, 1G illustrated in Fig. 1 of LeCarpentier do not communicate with each other by any means, nevertheless by a wireless communication.

The Office Action further contends that Fig. 1 and the disclosure associated with Fig. 1 of LeCarpentier teach "a gateway server adapted to communicate with each of said plurality of devices via a wireless communication, said gateway server being coupled to a communication network, said gateway server and said plurality of devices forming a local network, said gateway server acting as a master of said local network, each of said plurality of devices communicating with another of said plurality of devices via a wireless communication through said gateway server" as is recited in claim 1. Applicants respectfully disagree. The local stations 4X, 4Y and 4Z illustrated in Fig. 1 of LeCarpentier do not act as a master of any type of local network, as they simply monitor the machines connected thereto and collect operating information supplied by the franking machines. Furthermore, the franking machines do not communicate with each other through the local stations. There is also no disclosure, teaching or suggestion in LeCarpentier of "a remote device coupled to said communication network, said remote device communicating with said gateway server via said communication network, said gateway server creating a proxy for each of said

plurality of devices in said local network, wherein a service of at least one of said plurality of devices can be invoked by said remote device utilizing said created proxy for said at least one of said plurality of devices" as is recited in claim 1. These features are simply not present anywhere in LeCarpentier.

Lee is directed to a franking machine system in which a franking machine intended for operation at a predetermined location cannot be operated for franking mail if it is moved away from that location. A franking machine includes receiving means operative to receive a wireless signal sent from a transmission means that transmits a predetermined signal. The franking machine is operative in response to receipt of the predetermined signal by the receiving means to carry out a franking operation to frank a mail item and is inoperative to carry out a franking operation when the predetermined signal is not received. (Col. 1, lines 50-58).

Note first that in Lee there is no disclosure, teaching or suggestion of a gateway server that forms a local network with the plurality of devices and acts as a master of said local network. The Office Action contends that Lee teaches one or more postal processing machines interconnected by a local area radio frequency (RF) wireless communication network. (Office Action, page 6). This is simply not correct. The secure unit 32 of Lee is no more than a transmitter that may have the form of a secure safe like housing secured to a wall of the users premises and connected to a telephone line 33 whereby communication with the secure unit may be effected by means of the telephone network 34. (Col. 2, lines 57-61). The secure unit 32 does not establish any type of local network, nor does it act as the master of any type of local network. It simply transmits a signal, which is not the same as establishing a local network and acting as the master of the local network.

The Office Action contends that it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify LeCarpentier as taught by Lee to provide mobility to users. Note, however, that this is exactly the opposite of what Lee teaches. In Lee, unless a mailing machine is located in a predetermined location, it will be inoperative. As stated in the Abstract of Lee, "A franking machine intended to be operated at the predetermined location is inoperative to carry out franking operations unless it receives the signal transmitted to the predetermined location. Accordingly a franking machine intended for operation at the predetermined location cannot be operated for franking mail if it is moved

away from that location." Lee, therefore, does not provide mobility, but requires the franking machine to be located at a predetermined location to operate.

There is also no disclosure, teaching or suggestion in Lee of each of the plurality of devices communicating with another of the plurality of devices via a wireless communication through the gateway server as is recited in claim 1. In Lee, there is no discussion anywhere of any of the franking machines 30_1 to 30_n communicating with each other through any type of communication path, nevertheless through a gateway server.

There is also no disclosure, teaching or suggestion in Lee of "a remote device coupled to said communication network, said remote device communicating with said gateway server via said communication network, said gateway server creating a proxy for each of said plurality of devices in said local network, wherein a service of at least one of said plurality of devices can be invoked by said remote device utilizing said created proxy for said at least one of said plurality of devices" as is recited in claim 1. These features are simply not present anywhere in Lee.

The article to Sinclair does not cure any of the above deficiencies, as it is directed simply to wireless network connections generally, and more specifically the ability for multiple PC's to share a single Internet connection, and does not disclose, teach or suggest any of the features described above.

There is no disclosure, teaching or suggestion in any of the references, either alone or in any combination, of a mailing system that comprises "a plurality of devices associated with mail preparation, each of said plurality of devices adapted to communicate with other of said plurality of devices via a wireless communication; a gateway server adapted to communicate with each of said plurality of devices via a wireless communication, said gateway server being coupled to a communication network, said gateway server and said plurality of devices forming a local network, said gateway server acting as a master of said local network, each of said plurality of devices communicating with another of said plurality of devices via a wireless communication through said gateway server; and a remote device coupled to said communication network, said remote device communicating with said gateway server via said communication network, said gateway server creating a proxy for each of said plurality of devices in said local network, wherein a service of at least one of

said plurality of devices can be invoked by said remote device utilizing said created proxy for said at least one of said plurality of devices" as is recited in claim 1.

For at least the above reasons, Applicants respectfully submit that claim 1 is allowable over the prior art of record. Claims 2-10, dependent upon claim 1, are allowable along with claim 1 and on their own merits.

Claim 31 is directed to a method for invoking a service of a mailing device by a remote device, the mailing device belonging to a wireless mailing system, where the method comprises "registering said mailing device with a gateway server, said registration being done via a wireless communication between said mailing device and said gateway server; creating a proxy for said registered mailing device and storing said proxy in said gateway server; establishing a communication between said remote device and said gateway server via a network; selecting a service associated with registered mailing device via said communication between said remote device and said gateway server; and invoking said selected service via said proxy by said remote device."

The Office Action has not provided any indication, other than broad general statements, as to where any of the limitations of claim 31 are allegedly disclosed, taught or suggested in any of the cited references, either alone or in any combination. There is no disclosure, teaching or suggestion in LeCarpentier, Lee or Sinclair, either alone or in any combination, of registering a mailing device with a gateway server, said registration being done via a wireless communication between said mailing device and said gateway server; creating a proxy for said registered mailing device and storing said proxy in said gateway server; establishing a communication between said remote device and said gateway server via a network; selecting a service associated with registered mailing device via said communication between said remote device and said gateway server; and invoking said selected service via said proxy by said remote device as is recited in claim 31.

The Office Action appears to be contending that Sinclair's reference to DHCP (Dynamic Host Configuration Protocol) is equivalent to the registering a mailing device with a gateway server and creating a proxy for said registered mailing device and storing said proxy in said gateway server as is recited in claim 31. This is simply not correct. DHCP simply assigns an IP address to uniquely identify a computer that is making use of the

Internet. The IP address is used by the Internet to direct data to the computer. As noted in the memo "SIP:Session Initiation Protocol – Locating SIP Servers," an outbound proxy can be configured by any mechanism, including DHCP. This means that an outbound proxy (as defined in that article) can be given an IP address using DHCP. Assigning an IP Address is not the same as registering a mailing device with a gateway server and creating a proxy for the registered mailing device as is recited in claim 31.

For at least the above reasons, Applicants respectfully submit that claim 31 is allowable over the prior art of record. Claims 32-37, dependent upon claim 31, are allowable along with claim 31 and on their own merits.

In view of the foregoing amendments and remarks, it is respectfully submitted that the claims of this case are in a condition for allowance and favorable action thereon is requested.

Respectfully submitted,

Brian A. Lemm
Reg. No. 43,748
Attorney for Applicants
Telephone (203) 924-3836

PITNEY BOWES INC.
Intellectual Property and
Technology Law Department
35 Waterview Drive
P.O. Box 3000
Shelton, CT 06484-8000